

EX PARTE OR LATE FILED

April 24, 1997

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Federal Communications Commission
Office of Secretary

Chairman Reed Hundt
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: CC Docket Nos. 96-45 & 97-262
Ex Parte Communications

Dear Chairman Hundt,

Advocates for people with disabilities have made access to technology a main policy goal for the 1990s. Our focus has been on universal design and public policies that will allow people with disabilities to have ready access to the same technologies as others. The advances in telecommunications access that will be achieved as a result of Section 255 of the Telecommunications Act of 1996 will depend on all consumers having affordable access to a well-maintained, robust, high-capacity local network.

We are concerned that the Universal Service and Access Reform proceedings underway at the FCC could undermine our efforts to make sure that people with disabilities have full access to modern telecommunications services. The FCC's revision of these basic rules will have a major impact on the integrity and capacity of the public network. The public network is our link to all telephone and other communications services.

As we are only too keenly aware, the progress made on disability access in the new law is only a first step. Real access to telecommunications can only be achieved if network-based services are made accessible, as required by Section 255 of the Act. Major technology companies recently announced universal design policies -- a very exciting development for disability and technology advocates. If properly implemented, these policies will make basic telephone service and new features such as Caller ID, Internet Services, and Video Services more accessible. However, the regulations governing Section 255 have yet to be written. Even with meaningful regulations, the accessibility of these services depend on the deployment of an advanced, high capacity local network available to all telephone customers.

Universal service has been the foundation on which the telecommunications infrastructure was built in this country. Together we must make sure universal service remains the goal in a competitive market, not a casualty. The universal service rules you are writing only address a small part of that public policy goal. Drastic reductions in access charges threaten to push up local rates or to discourage investment in the network. Increases in the subscriber line charge on second phone lines discourage, and sometimes prevent, people from enjoying the benefits of the information age. Rules that force rates up and discourage investment will erode universal service, regardless of much money you put in a fund.

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Issues of affordability and accessibility bring together rural America and inner city dwellers, people of color, children and families, senior citizens and people with disabilities. We strongly object to any public policies that will result in higher rates or decreasing investment in the local telephone network. It is unwise and counter-productive to ignore the important relationship between the goals of access to telecommunications for persons with disabilities and the broader policy goals of affordability and the integrity of the local network.

Sincerely,

Steven Tremblay
Alpha One

Frank Bowe
Hofstra University*

Mary Pecha
College for Living

Allen H. Karp
Florida Association of the Deaf

Frank Pinter
MCIL Resources for Independent Living

Cheryl A. Heppner
Northern Virginia Resource Center for Deaf and Hard of Hearing Persons

Allen H. Karp
Palm Beach County Association of the Deaf

Betsy Bayha
World Institute on Disability

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cc: House Commerce Committee
Senate Commerce Committee
Commissioners Raachelle Chong, Susan Ness, James Quello
Secretary William Caton (two copies)

Keep America Connected!

National Campaign for Affordable Telecommunications

David Newburger, Chair
ConnectMissouri

Adrian Methodist Episcopal Church
Al Chan
Alliance for Public Technology
Alpha Kappa Alpha
Alpha One
American Agri-Women
American Association for Adult
and Continuing Education
American Beekeeping Federation
American Coalition for Ethanol
Association for Gerontology and
Human Development at Historically
Black Colleges and Universities
Central Alabama Health Alliance, Inc.
Communications Workers of America
ConnectMissouri
Federation of Southern Cooperatives Land
Assistance Fund
Florida Association for the Deaf
Green County Democrat
MCIL Resources for Independent Living
Massachusetts Assistive Technology
Partnership
Mid-America International Agri-Trade
Council
Missouri Center on Minority Health
and Aging
National Agricultural Aviation Association
National Association of Commissioners
for Women
National Association of Development
Organizations
National Black Caucus of State Legislators
National Council of Senior Citizens
National Farmers Union
National Hispanic Council on Aging
National Hispanic Law Enforcement
Association
The National Trust
National Latino Telecommunications
Task Force
Northern Virginia Resource Center for
Deaf and Hard of Hearing Persons
Palm Beach County Association of
the Deaf, Inc.
Personal Family Service Corporation
Presidents Club for Telecommunications
Justice
United Homeowners Association
United Seniors Health Cooperative
United States Durum Growers Association
United States Telephone Association
Universal Service Alliance
Virginia Public Interest Coalition
Wheat Quality Council
Women Involved in Farm Economics
Women of Distinction
World Institute on Disability
Youth Entrepreneurial Leadership Institute

For Immediate Release:
April 24, 1997

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Disability Advocates Urge Hundt Not to Sacrifice Accessibility in the Name of Competition

(WASHINGTON DC...April 24, 1997) In a letter sent today to FCC Chairman Reed Hundt, leading disability advocates expressed concern that access charge and universal service rules will undermine progress made in making telecommunications more accessible to people with disabilities.

The letter was endorsed by Alpha One, College for Living, Florida Association of the Deaf, MCIL Resources for Independent Living, Northern Virginia Resource Center for Deaf and Hard of Hearing Persons, Palm Beach County Association of the Deaf, World Institute on Disability.

The groups remind Chairman Hundt of the progress made in the 1996 Telecommunications Act that required network-based services be made accessible to people with disabilities. The groups express concern that the access charge and universal service rules "will have a major impact on the integrity and capacity of the public network."

"Drastic reductions in access charges threaten to push up local rates or to discourage investment in the network...Rules that force rates up and discourage investment will erode universal service, no matter how much money you put into a fund."

The letter maintains that advances in accessibility are only meaningful if the consumers are connected to a well-maintained, robust, high-capacity local network. They point out that, "It is unwise and counter-productive to ignore the important relationship between the goals of access to telecommunications for persons with disabilities and the broader policy goals of affordability and integrity of the local network."

For a copy of the letter please contact Angela Ledford at (202) 842-4080

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